

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE FOLLOWING DOMAIN NAMES:

ROJADIRECTA.ORG, and  
ROJADIRECTA.COM,

Civil Action No. 1:11-cv-04139-PAC

**CLAIM AND STATEMENT OF  
INTEREST IN DEFENDANT  
DOMAIN NAMES**

Defendants *in rem.*

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Please take notice that Puerto 80 Projects, S.L.U. (“Puerto 80”), a corporation organized under the laws of Spain, pursuant to 18 U.S.C. § 983(a)(4) and Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, by and through its undersigned attorneys, hereby asserts an ownership interest in, and makes a claim upon, the following domain names identified as a defendant *in rem* in the above-captioned case:

ROJADIRECTA.COM, and  
ROJADIRECTA.ORG

The basis of Puerto 80’s interest in the property is that Puerto 80 is the registrant and owner of the defendant domain names.

DURIE TANGRI LLP

Dated: July 15, 2011

By: Genevieve P. Rosloff  
Genevieve P. Rosloff

Mark A. Lemley (*Pro Hac Vice*)  
Ragesh K. Tangri (*Pro Hac Vice*)  
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*Attorneys for Defendant*  
PUERTO 80 PROJECTS, S.L.U.

VERIFICATION

I, Igor Seoane Miñán personally and on behalf of Puerto 80 Projects, S.L.U., pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing claims and assertions are true and correct to the best of my knowledge.

Dated this 15 day of July, 2011

PUERTO 80 PROJECTS, S.L.U.  
By:   
Igor Seoane Miñán, C.E.O.

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2011, I caused the **CLAIM AND STATEMENT OF INTEREST IN DEFENDANT DOMAIN NAMES** to be served via electronic means, via the Court's ECF system, on all counsel registered to receive electronic notices. I also certify that I have caused copies of the **CLAIM AND STATEMENT OF INTEREST IN DEFENDANT DOMAIN NAMES** to be served by first-class United States mail on the following:

Christopher D. Frey  
U.S. Attorney's Office, SDNY (St. Andw's)  
One St. Andrew's Plaza  
New York, NY 10007

David I. Miller  
U.S. Attorney's Office, SDNY (St. Andw's)  
One St. Andrew's Plaza  
New York, NY 10007

Copies of the **CLAIM AND STATEMENT OF INTEREST IN DEFENDANT DOMAIN NAMES** will be served by first-class United States mail on any party identified in the Notice of Electronic Filing as receiving notice by other means.

  
\_\_\_\_\_  
GENEVIEVE P. ROSLOFF

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